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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

HIGH SEC LABS LTD.,

Plaintiff,

v.

iPGARD INC.,

Defendants.

Case No.: 2:20-cv-01797-MMD-BNW

**STIPULATION AND ORDER FOR
45-DAY EXTENSION OF TIME TO
RESPOND TO COMPLAINT
(FIRST REQUEST)**

Pursuant to LR IA 6-1, 6-2, and LR 7-1, Plaintiff HIGH SEC LABS LTD. (“Plaintiff”) and Defendant iPGARD Inc. (“Defendant”), by and through their respective counsel of record, hereby stipulate and agree to a 45-day extension of time for Defendant to respond to the Complaint, as follows:

1. Plaintiff commenced this action by filing a Complaint (ECF No. 1) on September 25, 2020.
2. Defendant recently retained defense counsel, Maynard Cooper & Gale, LLC and Howard & Howard Attorneys PLLC, after learning of this lawsuit. The parties have agreed to stipulate to 45-day extension of time for Defendant to respond to the Complaint to allow Defendant a reasonable time to review Plaintiff’s Complaint and prepare a response. Accordingly, Defendant will have until December 7, 2020 to respond to the Complaint.

3. Defendant agrees that it will not dispute Plaintiff's service of the Complaint in exchange for Plaintiff's agreement to a 45-day extension of time, and that Defendant will respond to the Complaint by December 7, 2020 absent any further extension of time either by agreement of the parties or by motion to the Court.

THEREFORE, Plaintiff and Defendant hereby stipulate and agree that Defendant's time to answer or otherwise respond to Plaintiff's Complaint shall be extended to and include December 7, 2020.

DATED: October 21, 2020.

DATED: October 21, 2020.

WEIDE & MILLER, LTD.

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/s/ F. Christopher Austin

/s/ W. West Allen

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Attorneys for Plaintiff

Attorneys for Defendant

IT IS SO ORDERED

DATED: 6:20 pm, October 23, 2020



BRENDA WEKSLER
UNITED STATES MAGISTRATE JUDGE